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10 THE FACEBOOK, INC. and MARK ZUCKERBERG

11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN JOSE DIVISION
14

15 THE FACEBOOK, INC. and MARK
16 ZUCKERBERG,

17 Plaintiffs,

18 v.

19 CONNECTU, INC. (formerly known as
20 CONNECTU, LLC), PACIFIC
NORTHWEST SOFTWARE, INC.,
21 WINSTON WILLIAMS, WAYNE CHANG,
and DAVID GUCWA,

22 Defendants.
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Case No. 5:07-CV-01389-RS

**[PROPOSED] ORDER GRANTING
MOTION TO COMPEL
COMPLIANCE BY DEFENDANTS
PACIFIC NORTHWEST SOFTWARE
AND WINSTON WILLIAMS WITH
ORDER GRANTING MOTION TO
COMPEL SUPPLEMENTAL
INTERROGATORY RESPONSES**

Date: January 27, 2008
Time: 9:30 A.M.
Judge: Honorable Richard Seeborg

1 The Court, having considered the Notice of Motion, Motion and Memorandum of Points
2 and Authorities in Support of Facebook, Inc.'s ("Facebook's") Motion To Compel Compliance
3 By Defendants Pacific Northwest Software And Winston Williams With Order Granting Motion
4 To Compel Supplemental Interrogatory Responses, the Declarations of Chris Shiflett and Monte
5 M.F. Cooper in support thereof, exhibits submitted therewith, and the records on file in this
6 action, hereby orders as follows:

7 IT IS HEREBY ORDERED that Facebook's Motion is GRANTED.

8 IT IS FURTHER ORDERED that:

9 (1) Pacific Northwest Software, Inc. ("PNS") and Winston Williams ("Williams")
10 shall within fourteen (14) days of this Order supplement their prior responses to Interrogatories
11 Nos. 3 and 4 and provide full, complete answers to each; and

12 (2) [PNS and Williams shall provide all memory devices in their possession, custody
13 or control from 2004 to present to Facebook's expert for imaging and analysis for information
14 responsive to Interrogatory Nos. 3 and 4. The parties shall within seven (7) days of this Order
15 submit a proposed protocol for the imaging and analysis, with a joint statement concerning only
16 those elements of the proposed protocol about which the parties cannot reach agreement]; or

17 (3) [The Court enters the following factual finding: PNS and Williams, jointly and
18 individually, caused three ConnectU invitation e-mails to be sent to each of three million e-mail
19 addresses obtained by PNS and Williams from the Facebook website.]

20 IT IS SO ORDERED.

21
22
23 Dated: _____

Honorable Richard Seeborg
United States Magistrate Judge